

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*

Case No. 18-OP-45090

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*

Case No. 17-OP-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF TIMOTHY W. KNAPP IN SUPPORT OF MANUFACTURER
DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT
FOR PLAINTIFFS' FAILURE TO OFFER PROOF OF CAUSATION**

I, Timothy W. Knapp, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan Finance, LLC, Allergan plc, Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.
2. I submit this declaration in support of Manufacturer Defendants' Reply in Support of Motion for Summary Judgment for Plaintiffs' Failure to Offer Proof of Causation.
3. Attached as Exhibit 1 is a true and correct copy of excerpts of Plaintiffs the City of Cleveland, County of Cuyahoga, County of Summit and City of Akron's Supplemental Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories, Submitted Pursuant to Discovery Ruling No. 13, served on December 31, 2018.

Dated: August 16, 2019

Respectfully submitted,

/s/ Timothy W. Knapp

Timothy W. Knapp
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Tel: (312) 862-2000
timothy.knapp @kirkland.com

*Attorney for Defendants Allergan Finance, LLC f/k/a
Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.;
Allergan Sales, LLC; Allergan USA, Inc.; and specially
appearing Defendant Allergan plc f/k/a Actavis plc*

CERTIFICATE OF SERVICE

I, Timothy W. Knapp, hereby certify that the foregoing document was served via electronic mail to all parties.

/s/ Timothy W. Knapp

Timothy W. Knapp
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Tel: (312) 862-2000
timothy.knapp@kirkland.com